

For Six Month Period Ending JUL 19 1990
(Insert date)

Name of Registrant

Registration No. 1648 JLN

Sontheimer Hazlett, Ltd. also D/B/A Sontheimer group, also through Mallory Factor
Inc. St. Maarten Tourist Info. office & Bonaire Tourist Bureau.
Business Address of Registrant

275 Seventh Avenue
NY, NY 10001-6788

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection
Ended

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4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☐ N/A

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal

Date of Termination

-
9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

-
10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Registrant is engaged as P/R counsel in the United States for the purpose of promoting tourism on the islands of St. Maarten & Bonaire, Saba and St. Eustasius.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
Amortized over Sixth month period	Gov't of Island Territory the Windward section St. Maarten	Payment for NY office suite for tourism & svces. rendered on behalf of the tourism office	150,800
Amortization over Sixth month period	Bonaire Gov't	Same as Above	84,000
Total			234,800

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal. Gov't of Island Territory, Windward Island section of St. Maarten & Bonaire.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See schedule I (attached)

Total

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following: N/A

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups: N/A

☐ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in this political propaganda: N/A

☐ English ☐ Other (specify) _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐ N/A

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐ N/A

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☐ No ☐ N/A

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☐ No ☐
Exhibit B⁷ Yes ☐ No ☐ N/A

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Yvonne Nichie
Yvonne Nichie

Subscribed and sworn to before me at 275 Seventh Avenue NY, NY 10001-6788

this 15th day of July, 19 90

FRANCES PRECARIO
NOTARY PUBLIC State of New York
No. 31-4723818
Qualified in New York County
Commission Expires 7/31/92

Frances Precario
(Signature of notary or other officer)

⁸The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

Disbursements JANUARY 20 - JANUARY 31, 1990

Date	To the order of	Check#	AMOUNT
23	Sutton Designs	5901	108.78
23	Olympic Courier	5908	43.50
23	DHL	5924	46.75
23	UPS	5927	34.95
23	Federal Express	5928	100.00
30	Businesswire	5956	260.00
30	UPS	5968	123.46
30	Luce Press	5972	677.10
30	Sutton Designs	5974	72.00
30	Gail Knopfler	5978	430.00
30	Olympic Courier	5979	15.00
30	Manhattan Courier	5980	6.00
30	Victor Curtin	5983	396.00
30	Metro Quick	5984	54.99
	TOTAL - JAN. 20 - JAN. 31, 1990		2,368.53

INTERNAL SECURITY
SECTION
REGISTRATION UNIT

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Disbursements FEBRUARY 1990

Date	To the order of	Check#	AMOUNT
7	Public Relations Plus	6017	105.00
7	Olympic Courier	6019	13.00
7	DHL	6024	36.25
7	Burrelles Press	6026	267.51
7	Federal Express	6033	275.00
7	MM Mastercard	6035	1,336.00
7	Sabra Limo	6044	372.60
7	St. Marteen Nights	6050	300.00
14	UPS	6081	51.85
14	Adam Shoehalter	6082	481.60
14	Brody & Weiss	6093	1,000.00
21	Federal Express	6111	168.80
21	Consolidated Freight	6112	96.92
21	DHL	6116	395.04
21	Brody & Weiss	6126	700.00
28	Federal Express	6164	92.00
28	Burrelles	6170	237.42
28	Video Monitoring	6172	160.55
28	New York Athletic	6176	139.49
28	UPS"	6195	60.05
	TOTAL FOR THE MONTH OF FEBRUARY 1990		6,289.08

CASH DISBURSEMENTS MARCH 1990

Date	To the order of	Check#	AMOUNT
7	Airborne Express	6210	15.00
7	Federal Express	6213	250.00
7	UPS	6216	22.44
14	Luce Press	6260	1,004.13
14	Federal Express	6261	312.50
14	UPS	6262	88.81
14	Airborne Express	6263	15.00
14	Olympic Courier	6266	14.95
14	Sabra	6271	56.60
15	NYC Dept. of Finance	6276	730.62
16	Petty Cash	6281	21.54
26	Airborne Express	6295	16.00
26	Brody & Weiss	6303	350.00
26	India House	6306	32.86
26	Federal Express	6308	112.00
26	Manhattan Courier	6312	18.00
26	Olympic Courier	6315	11.50
26	Burrelles Clipping	6316	241.01
26	UPS	6325	59.91
26	HFD	6326	24.95
28	Businesswire	6343	435.00
28	Newcastle Comm	6349	405.94
	TOTAL FOR THE MONTH OF MARCH 1990		4,238.76

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Disbursements APRIL 1990

Date	To the order of	Check#	AMOUNT
4	AA Freight	6368	200.90
4	Belle Arbor Prmotion	6369	757.54
4	Luce Press	6378	631.86
4	Olympic Courier	6384	13.00
4	UPS	6395	438.47
4	Airborne Express	6401	192.00
4	Federal Express	6404	122.00
4	Bureeles P{ress	6406	849.02
11	NYS Corporation	6418	1,200.00
11	FEDEX	6435	99.40
11	UPS	6446	178.98
11	Sabra Limo	6447	385.40
11	Petty Cash	6452	2.00
11	Travel Trade	6455	10.00
18	FEDEX	6477	67.20
18	Island Publishing	6478	1,091.23
18	The Travel Agent	6487	79.00
18	UPS	6490	213.30
19	Martha Colon	6505	100.00
19	Manhattan Courier	6507	36.30
25	Airborne	6521	89.00
25	Manhattan Courier	6527	35.00
25	Travel Weekly	6538	23.00
	TOTAL FOR THE MONTH OF APRIL 1990		6,814.60

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Disbursements MAY 1990

Date	To the order of	Check#	AMOUNT
2	BURRELLES PRESS	6555	238.58
2	COPYCARE	6560	1,288.17
2	FEDEX	6563	168.90
2	LUCE PRESS	6564	643.17
2	UPS	6569	7.24
3	MARINE MIDLAND	6589	1,961.00
3	AMERICAN EXPRESS	6590	30.00
3	MARTHA COLON	6593	200.00
3	OFFICIAL AIRLINE	6594	273.56
3	NY CITY DEPT. OF FIN	6595	1,200.00
3	OLYMPIC COURIER	6597	36.50
3	MANHATTAN	6598	46.30
3	CTI	6599	186.82
16	PETTY CASH	6620	6.02
16	AIRBORNE	6626	64.00
16	FEDEX	6635	148.25
16	MANHATTAN	6642	6.00
16	SAMA	6649	1,000.00
16	UPS	6653	245.80
23	BRODY & WEISS	6683	350.00
23	FEDEX	6688	102.00
23	OLUMPIC	6693	29.95
23	SABRA	6695	918.00
23	SUMMIT	6697	34.66
23	UPS	6698	350.99
23	COPYCARE	6700	352.90
23	BUSINESS FUNDING	6701	6.00
31	BUSINESSWIRE	6721	270.00
31	FEDEX	6727	139.66
31	AIRBORNE	6735	100.90
31	LOY-TAUBMAN	6745	568.31
31	LUCE PRESS	6746	596.89
	TOTAL FOR THE MONTH OF MAY 1990		11,570.57

Disbursements JUNE1990

Date	To the order of	Check#	AMOUNT
1	COPY TECHNOLOGIES	6760	180.45
5	MARTHA COLON	6766	100.00
5	PREVISIONS	6767	135.00
6	AIRBORNE EXPRESS	6778	15.00
6	FEDEX	6779	52.60
6	UPS	6781	66.10
6	CTI	6783	210.55
7	MARINE MIDLAND	6790	950.00
8	BUSINESS FUNDING	6799	22.00
13	FEDEX	6810	179.25
13	AIRBORNE	6817	16.00
13	CTI	6826	471.23
13	BUSINESS FUNDING	6828	12.00
13	OLYMPIC COURIER	6834	32.60
14	PETTY CASH	6836	48.75
20	AIRBONE	6862	32.00
20	LOY TAUBMAN	6880	121.24
20	UPS	6883	61.40
20	SABRA	6886	866.80
20	FEDEX	6887	301.90
23	MJD QUICK	6895	51.00
	TOTAL FOR THE MONTH OF JUNE 1990		3,925.87

DISBURSEMENTS-JUNE 27-JULY 19, 1990

DATE	VENDOR	CK NO.	AMOUNT
6/27/90	BUSINESS FUNDING CORPORATION	6936	12.00
6/27/90	OLYMPIC COURIER	6937	6.50
6/27/90	AIRBORNE EXPRESS	6938	16.00
6/27/90	BRODY & WEISS	6979	750.00
6/27/90	NYC DEPARTMENT OF FINANCE	6961	730.00
6/29/90	UNITED PARCEL SERVICE	6977	268.24
7/2/90	MARTIN BECK THEATER	6978	110.00
7/5/90	AUTOMATIC DATA PROCESSING	6981	7.42
7/5/90	AIRBORNE EXPRESS	6983	16.00
7/5/90	BURELLES PRESS CLIPPING	6989	255.96
7/5/90	BUSINESS FUNDING	6990	17.00
7/5/90	FEDERAL EXPRESS	7001	99.35
7/5/90	LUCE PRESS CLIPPING	7007	588.66
7/5/90	MARINE MIDLAND BANK	7011	1,233.95
7/5/90	NEWS EVENTS PHOTO	7013	377.89
7/5/90	OLYMPIC COURIER	7019	16.00
7/5/90	UNITED PARCEL SERVICE	7030	288.99
7/11/90	AIRBORNE EXPRESS	7054	148.00
7/11/90	FEDERAL EXPRESS	7066	147.50
7/11/90	OLYMPIC COURIER	7073	8.70
7/11/90	THE GUARDIAN	7081	414.96
7/11/90	UNITED PARCEL SERVICE	7082	34.06
7/13/90	PETTY CASH	7095	4.21
7/16/90	NYS CORPORATION TAX	7097	1,200.00
7/19/90	AIRBORNE EXPRESS	7102	32.00
7/19/90	BUSINESS FUNDING CORPORATION	7108	6.00
7/19/90	SABRA LIMO CAR SERVICE	7117	523.30
7/19/90	UNITED PARCEL SERVICE	7127	52.10
	TOTAL		7,364.79

SONTHEIMER

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes _____ or No _____

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No _____

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Spence A. McKie
Signature

Oct 10, 1990
Date

Please type or print name of signatory on the line above

Title

INTERNAL SECURITY
SECTION
REGISTRATION UNIT

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